

Exhibit K

Debra L. Phillips

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
DEBRA L. PHILLIPS

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF SOUTH CAROLINA)

: SS.:

COUNTY OF LANCASTER)

DEBRA L. PHILLIPS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3072 Streamhaven Drive, Indian Land, SC 29707.

2. I am currently 64 years old, having been born on December 21, 1957.

3. I am the wife of Stephen E. Phillips, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On August 2, 2015, my husband Stephen died from metastatic colon cancer at age 58. Stephen's cancer was found to be caused by his exposure to toxins resulting from the 9/11 attacks on the World Trade Center.

5. Stephen and I had a special marriage. It was teamwork. We had mutual love for our children. We shared dreams and had our lives planned. We had a great balance, and Stephen understood me better than anyone else. People liked to be around Stephen, as he was very sociable. We used to love to garden together, host events with our friends and neighbors, and cook together. Stephen and I were married at age 20 and had been married over 30 years at the time of his death. Even when he was sick, Stephen always watched after me, our

children, and my sisters.

6. September 11, 2001 was a day that changed the course of our lives. I couldn't get in touch with him at first. When he came home, he told me how he was hit with debris. He was stuck at his workplace, Fulton Fish Market. Years later, I recall him saying, "all these guys [working in the exposure zone] are getting sick with weird cancers."

7. Stephen was overdue for a doctor's appointment, so I told him to go get a check up. My children and I were in denial when Stephen received his cancer diagnosis; we were so shocked. I was working full-time when Stephen was diagnosed with colon cancer. I took FMLA (Family and Medical Leave Act) time off to take Stephen to his treatments. He had several complications during his treatments, and our insurance wouldn't cover all the costs for the complications. I remember having to give him injections in his leg at home. I'm not a doctor, I didn't know how to do those things. I remember falling through the bathroom wall once while trying to bathe Stephen because he couldn't bathe himself. I cared for him until the day he died. I was under a tremendous amount of stress and anxiety, but I felt like I couldn't "lose it," because our entire family would fall apart. My daughter Nicole also became more physically involved with Stephen's care as his illness progressed. Once, while Stephen was in treatment, I ended up in the hospital with a stress-induced double bowel obstruction, so we were both hospitalized. I was afraid to leave the house at some times. I felt denial and anticipatory grief before he died.

8. Stephen and I wanted to retire at age 62 to South Carolina. I was a secretary at a law firm and didn't make as much income as Stephen did. When he stopped working due to his illness, I wondered how I was going to continue to afford my home. We moved down to South Carolina, away from everyone we loved, to go somewhere that would be more financially stable for me. I was worried about how Stephen would take care of our family when he was sick, as he was always the caretaker and protector in our family. I thought that if I took the best possible care of him, that he would live.

9. I am also a three-year survivor of breast cancer. It was extremely hard not having Stephen by my side when I was diagnosed with breast cancer. He should have been here.

10. After Stephen died at the young age of 58, our family relationship has never been the same. I feel like I have lost half of myself. My daughter Nicole, my son Craig, and I are all in

therapy. Stephen's colon cancer and death "blew my family apart." Craig has now moved to Connecticut, since our family relationship has become more strained since Stephen's death. We have suffered such grief and loss that it has torn our family apart. I am not sure how to hold my family together.

Debra L. Phillips
DEBRA L. PHILLIPS

Sworn to before me this
7 day of April, 2022

Deborah Valvano
Notary Public



Tracy DiMarco

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
TRACY DIMARCO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

TRACY DIMARCO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 383 Chandler Road, Jackson, NJ 08527.

2. I am currently 60 years old, having been born on May 19, 1961.

3. I am the stepdaughter of Samuel M. Picone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My stepfather died of Non-Hodgkin's Lymphoma on March 24, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My parents lived with me while Samuel was still alive. We did everything together. Samuel was such a good person and a dear friend. He was always there when I needed him and often helped me out with my dogs. He loved them. Samuel knew the city like the back of his hand. He enjoyed taking me and my mother out to dinner in the city and then to the opera. That was the best. I truly miss that. Every year, we would go to see the Macy's Thanksgiving Day Parade; and in the summer, we liked going to the beach. The things we did together were

just normal family things, but somehow Samuel always made them seem special.

6. Samuel worked in private sanitation. He had a lot of friends who were first responders, and he volunteered with them in the clean-up. He had many customers in the World Trade Center. He volunteered in lower Manhattan for weeks and weeks following the 9/11 attacks. He even took us down there once or twice. We saw the destruction of the World Trade Center with our own eyes. It was quite disturbing, something I will never forget.

7. Sometime in 2018, while I was home with Samuel, I looked at him and said, "Your neck is enlarged." He told me he hadn't been feeling well. I noticed that he didn't look too well either. I felt a huge lump in his neck. One of my best friends is an EMT, and suggested that he get it checked right away. We made an appointment for a primary care doctor, who took one look at Samuel and sent him to the hospital. I just knew something was wrong. Within 24 hours, he was diagnosed with a rare strain of Non-Hodgkin's Lymphoma. They said the cancer had already progressed to Stage III or IV. We were shocked. The doctors kept telling us that if he had chemotherapy, and possibly surgery, he could possibly get better.

8. My mother and I took him to all his treatments. When he wasn't in treatment, he was at home and we were taking care of him. Samuel grew so weak so quickly, and he would fall all the time. He also became incontinent. He was mortified at how sick he was. I made him special food and drinks to try to boost his energy, but it rarely worked. When he was in the hospital, I would sit there all day with him. I wish the doctors had been more upfront with us. I felt shortchanged. I felt like no one was being honest with us. I could see myself that there was little chance that he would recover. I felt terrible for both of my parents. They had just bought a house in North Carolina to retire in and weren't even going to get the chance to move there. Samuel was so upset, and it seemed like he had lost all of his dignity.

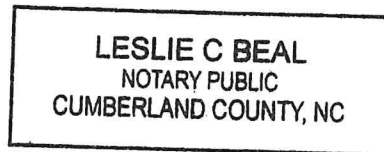
9. I put my job on hold to take care of Samuel. I also had to help my mom as much as I could. My husband pitched in to help a lot, too. When Samuel would fall, it would take four of us to help him up. I bought him a special chair after his first fall and installed safety guards for inside the house. He kept apologizing to us, and I didn't know what to say. We did everything we could to make him feel comfortable. Unfortunately, it was quick. He was a big man, 260 pounds, and he lost so much weight. We saw him deteriorate really fast and that was horrible.

10. I miss Samuel a lot. He was the glue that held our family together. His death has thrown a wrench into all of our lives. Lymphoma took a man who was healthy and active and completely changed his life. He thought he was doing good by volunteering at the World Trade Center. 9/11 has ruined so many lives. My mother is not herself. She has had another stroke since my father's death. She is emotional all the time. I try to remember the good times. But his illness was a terrible experience.


TRACY DIMARCO

Sworn to before me this
10th day of April, 2022


Notary Public



Pauline Picone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
PAULINE PICONE**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

PAULINE PICONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Hyannis Street, Toms River, NJ 08757.

2. I am currently 81 years old, having been born on November 25, 1940.

3. I am the wife of Samuel M. Picone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lymphoma on March 24, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Samuel and I were always together. Wherever one of us was, the other was close by. We loved to just be with each other. We never found it necessary to have a “girl’s night out” or “boy’s night out.” We preferred to spend our time together. We enjoyed each other’s company and loved to ride motorcycles together. After Samuel retired, he and I spent every single day together.

6. Samuel was in the paper recycling business. He had many customers in and around the World Trade Center. We also had many friends in the Fire Department. When he learned of what happened on September 11, 2001, without hesitation Samuel said, "I'm going to go volunteer." He felt it was something he needed to. So, a few days after the attacks, he went down to Ground Zero to volunteer. When he came home, his clothes were covered in dust, the car was covered in dust. Dust was everywhere. Later, some of his clients needed help cleaning out their shops and offices. Naturally, Samuel went to help them. He never wore gloves or a mask. It wasn't mandatory since the public was told the air quality was safe. I always thought to myself, "How could they say this air is clean? The EPA must be stupid." I told Samuel that there had to be asbestos in those buildings. Between that and the gas from the planes, the pulverized concrete, and the burned furniture and carpeting, it couldn't possibly be safe.


7. Samuel must have been suffering from lymphoma for quite some time before he told me. One day I noticed a lump on his neck and asked him, "Did you know that you have a lump in your neck?" He was a large man, about 6'2, with a large neck. My daughter Tracy is a nurse, and she asked to examine him. I asked him, "What are you trying to hide?" We lifted up his shirt, and his chest looked like leather. He had bulges protruding from his torso.

8. We went to the doctor, and they kept taking tests and doing biopsies. He was soon diagnosed with Stage IV lymphoma. I was in shock and denial, because before that Samuel had never been sick a day in his life. He required surgery to attach the lungs back to the wall of his chest (thoracentesis). I stayed with him for a few nights in the hospital. He had hot flashes and cold flashes, and they even had to resuscitate him once, as he stopped breathing. It happened while I was in the room. It petrified me. I stayed with him that whole night. After it happened, he kept asking, "Pauline, are you here?" It broke my heart because I knew he was scared as well.

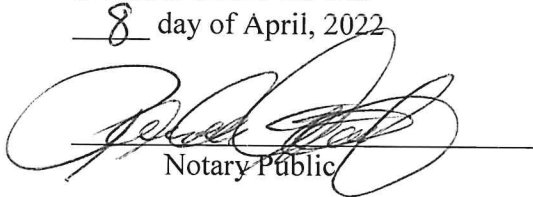
9. I hadn't driven in years, because Samuel used to drive me everywhere. But I had to drive him back and forth to the hospital. It made me so nervous. When he got out of the hospital, I had to drive him every day to his chemotherapy. He had a hard time going to the bathroom, and he had a lot of falls. It was hard for me to help him because I was also not in good health. If he fell, I would have to get him a blanket and pillow and tell him to wait until my grandson and son-in-law could come and lift him to get him into bed.

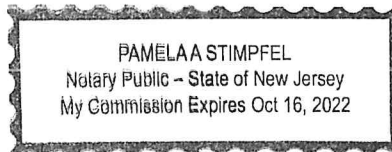
10. He soon went back to the hospital and was then transferred to a rehabilitation facility, where I visited him every day. I could see that the pain was getting to him. He was becoming despondent. I had to be his advocate. I had to convince his nurse and the social worker that he needed to be in a private room because of his compromised immune system. I finally got them to agree. The next day, when I arrived at the rehab facility to bring him pajamas, he didn't look right. I knew something was wrong right away. He was sitting in a chair just drooling. I pleaded with the two nurses to help him, and they rushed him into an ambulance. He was severely dehydrated. He died in the ambulance on the way to the hospital. I was in complete shock. I never expected it would happen that way and so soon.

11. Life has been so hard without him. I never realized how much he took care of. I have had eleven strokes in my lifetime, as well as a heart attack and a colon resection. I don't leave the house because my health is not good. I never felt unsafe before, but since he passed away, I don't feel safe without him. Everything is a mess without him. I never realized that he did everything for me except for the cooking and the laundry. I still can't believe that he's not here. He gave of himself to help others after 9/11 and it ended up costing him his own life. It's simply not fair.


PAULINE PICONE

Sworn to before me this
8 day of April, 2022


Notary Public



Alina Grajewski

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
ALINA GRAJEWSKI

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF ESSEX)

ALINA GRAJEWSKI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 445 Elmwood Avenue, Maplewood, NJ.

2. I am currently 59 years old, having been born on February 26, 1963.

3. I am the sister of Joann M. Porfiris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister died from breast cancer on September 15, 2016, at the age of 52. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. Joann and I were about a year and a half apart from each other. We were always together. When I moved to New Jersey from Brooklyn, we lived around the corner from each other. We helped raise each other's kids, hung out all the time, and ate dinner at each other's houses all the time. We were extremely close and were truly best friends.

6. Joann had a business on Church Street, between Murray Street and Park Place in lower Manhattan. She wasn't there on September 11, 2001, but as soon as the National Guard let people back downtown, she and her husband went back to make sure they could re-open their store. She was there all the time, constantly cleaning away the dust and debris.

7. I remember when Joann was diagnosed with breast cancer. We were texting, and she told me, "I think something's wrong." She went to the doctor and soon after found out that the lump on her breast was breast cancer. She was diagnosed on March 31, 2015. The next day, I went with her to a breast surgeon, who confirmed her diagnosis. From the look on the doctor's face, I knew it was not a good situation.

8. By April 2015, she had started chemotherapy. They started it earlier to shrink the tumor before surgery. Joann sold her house that month and moved in with me and my family. We lived together during the time she was fighting her breast cancer battle. We had dinner together every night. Joann was very positive through the whole thing, she kept telling me that she would get through this. Things were going well. But shortly after the radiation, her liver began to fail. She started to really not feel well. I was so worried for her, I wasn't sleeping at all. It was hard to watch her, she had little energy and was in a lot of pain. I remember sitting at the kitchen table with her and a friend. Joann had so little energy, she couldn't even sit at the table. She had to go lay down on the couch. I walked outside with the friend and completely broke down crying over the fact that I was going to lose her.

9. Joann's father-in-law passed away about two months before she did, and she couldn't even go to the wake out on Long Island. I came home that night and saw her lying on the couch, she had no energy. It completely broke my heart. I could see in her face that she knew what was happening. Still, she was trying to be strong for everyone, especially her children.

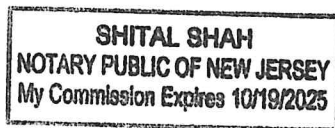
10. I want the court to know that Joann went through excruciating pain. She suffered mentally, too. She had young children. I remember her telling me that what hurt the most was all the years she sacrificed and worked in hopes to enjoy her retirement and see her children

grow up. She would never have that, she would never get to see her children become adults.


ALINA GRAJEWSKI

Sworn to before me this
6th day of April, 2022


Notary Public



Leokadia Grajewski

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
LEOKADIA GRAJEWSKI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

LEOKADIA GRAJEWSKI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 211 Kent Street, Brooklyn, New York 11222.

2. My current age is 84, having been born on September 28, 1937.

3. I am the mother of Joann M. Porfiris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My daughter passed away from breast cancer on September 15, 2016, at the age of 52. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Although my daughter lived about an hour away from me, I was the closest to her of all my children. We spoke on the phone at least two or three times per week, and she always made sure to come to see me for dinner at least twice a month. Whenever I needed to go shopping, she would take me to the mall or Costco. She always knew what I needed, without

making me feel like I was taking too much of her time.

6. Joann and her husband had a business a few blocks away from the Twin Towers. After 9/11, their store was closed for a couple of weeks due to destruction in the area. Joann was anxious to get back to the area to restart her business, because they had bills to pay and their store was their only source of income. Once she was allowed back into the exposure zone, she and her husband worked together to clean up all of the dust and debris in the store so they could open as soon as possible.

7. When my daughter was diagnosed with breast cancer, she came to tell me of her diagnosis. She told me she was scared and worried about her family. She had a mammogram only ten months earlier that showed no signs of cancer, which meant her cancer was aggressive as it had already spread. She told me she would fight with everything she had to beat it.

8. Once Joann was diagnosed, I worried about her constantly. What if she didn't make it? How would her husband and children handle life without her? How could I handle life without her? After several rounds of chemotherapy and radiation, plus a surgery, it seemed like the treatments had worked and Joann was cancer free. I was thrilled that she was going to survive. But within a few short months, her cancer was back, worse than ever. Seeing her in such physical and emotional pain was one of the most heartbreaking things I've ever had to deal with.

9. Soon after Joann was diagnosed, she sold her house and moved in with my other daughter. I was still working at the time, so I came to see her on the weekends. Whenever she was feeling well enough, she would come to visit me in Brooklyn. We talked on the phone almost every day. Her family was struggling financially, as they had recently lost their business and she could not work due to her illness. In addition, the cost of treatments and surgeries had taken a toll on Joann and her husband. I helped them out financially to pay off outstanding debts from the business plus their two children's tuition.

10. My daughter was only 52 years old when she died, leaving two children, a husband, and a family who loved her very much. We were always close, and we continue to be close, but with a huge piece missing. Joann was strong for as long as she could be throughout her entire illness, but when her cancer came back she was in a lot of physical pain. Her emotional and mental state suffered as well. No parent wants to see their child in pain, and no

parent should ever have to bury their child. I am heartbroken over the loss of my daughter.


LEOKADIA GRAJEWSKI

Sworn to before me this
18th day of May, 2022


Notary Public

PHYLLIS JORDAN
Notary Public, State of New York
No. 01JO4981778
Qualified in Queens County
Commission Expires May 20, 2023

Wanda Kassimis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
WANDA KASSIMIS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

WANDA KASSIMIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 211 Kent Street, Brooklyn, New York 11222.

2. I am currently 51 years old, having been born on May 15, 1970.

3. I am the sister of Joann M. Porfiris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from breast cancer on September 15, 2016, at the age of 52. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. I was seven years younger than my sisters, and our family life was somewhat challenging. Joann was like a maternal figure to me—everything she did, I wanted to do. My older sisters, Alina and Joann, always took care of me. Joann was a strong businesswoman, and she owned a store in downtown Manhattan. I was inspired by her to open my own store in Midtown.

6. Joann wasn't in lower Manhattan on September 11, 2001. However, as soon as she learned of the attacks, she started trying to get to her store. It was located on Church Street, just a few blocks from where the Trade Centers stood. She just wanted to re-open, get everything cleaned up, and get back in business. She didn't want to wait through the whole bureaucratic process to get her shop re-opened.

7. I remember when I first learned about Joann's breast cancer. She texted me at work about her diagnosis on March 31, 2015. She had concerns about a lump on her breast earlier, but she was passive about it. She told me, "Oh, it's okay, I'm going to be fine." Even when she received her diagnosis, she was positive—she was convinced that she'd go see the doctor and be fine. She said she would have gone through any treatment, taken any medications just to get better.

8. It was excruciating watching her suffer and go through treatment. We all tried to play a very positive role in her life, and we worked hard to get her the treatment she needed. She had chemotherapy almost daily, and we took turns going to the hospital to support her. It was a family circle of support, we all leaned on each other to get Joann through her chemotherapy, treatments, and subsequent diagnoses. I helped her out financially, but I wanted to make that sacrifice for her. I felt as though it was the least I could do. The biggest impact for me was emotional. Joann was like a mother to me. I was in denial for a long period of time. We were fighters, and we were raised to be fighters. Before she passed, Joann told me, "I don't care how much physical pain I have to go through. The worst part is knowing that I won't be able to see my kids graduate high school, graduate college, or get married." It was heartbreaking that she had to come to that realization and give in at the end. We all feel her loss terribly and know that our lives will never be the same without her.


WANDA KASSIMIS

Sworn to before me this
12th day of April, 2022



Notary Public

PHYLLIS JORDAN
Notary Public, State of New York
No. 01JO4981778
Qualified in Queens County
Commission Expires May 20, 2023

Adam Porfiris

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

**AFFIDAVIT OF
ADAM PORFIRIS**

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY AD Pennsylvania
: SS.:
COUNTY OF ESSEX AD Northampton

ADAM PORFIRIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 7 Elliott Place, West Orange, NJ 07052.
2. I am currently 21 years old, having been born on January 1, 2001.
3. I am the son of Joann M. Porfiris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mother died from breast cancer on September 15, 2016, at the age of 52. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks. I was only 15 years old at the time of her death.
5. My mom was as involved as anyone could be in my life. She was almost as involved as I am in my own life. We were extremely, extremely close. She was one of my best friends, and we did everything together. I loved and respected her, she was my role model. We went shopping together and out to the movies. She was a part of my life every day.

6. I was only eight months old on September 11, 2001, so I don't have a good firsthand account. My mom was home with me on that day. She returned to lower Manhattan soon after 9/11 to check in on her store. As soon as the government let her back into lower Manhattan, she was down there. I know my mom and dad worked in lower Manhattan for the next 15 years or so following 9/11.

7. I vividly remember when I came home from school on March 31, 2015. My mom sat me down at the kitchen table and told me that she was diagnosed with cancer. I was shocked and scared more than anything. It took a few days to really sink in. I was still so young. I didn't understand "cancer battles." I thought she was going to die right away. But she started fighting the cancer, and it was good at first. When she first got diagnosed, I was really sad. She had always instilled in me that I had to keep going, so that's what I did.

8. It was really stressful and difficult to see her struggle, physically, mentally, and emotionally. My mother was always a strong woman. We relied on her for everything. When you're fourteen years old, it's hard to see your role model hurting and in pain. I remember coming home from school, seeing her lying down on the couch, too tired to do anything. Not even wanting to talk. It was also extremely hard watching her go through chemo and surgeries. It was mentally exhausting, and it was a sad, agonizing time for all of us.


9. My mom's illness consumed my mind almost all of the time. I tried to help her out with whatever she needed. Whenever I wasn't in school, or when I was on summer break, I would try to spend time with her. School was hard during those years. It was hard to come home and do schoolwork in the stressful environment created by someone's illness. But we knew it wasn't her fault. After she passed away, it was difficult for me to get that edge back and focus in school.

10. There are a lot of little experiences that I remember. The memory that stands out to me the most is when she discovered that her cancer had come back. She came back from the doctor that day and just ran through the door and threw all her bags on the floor. She went straight upstairs to her room, crying. I went to go check in on her, because I knew she was having issues with her liver. When she came out of her room, she just looked me and started crying. She told me she was sick again and that it was going to be a lot worse this time. She told me that maybe she was going to die soon. She said she would be sad to miss graduations,

wedding, and grandkids. It was pretty traumatic to hear that at age fifteen. My mother was a good woman who struggled a lot. She had such a hard struggle. But through it all, she kept telling me to keep trying to be strong, because she knew she was going to pass sooner rather than later. I think of that day almost every day.


ADAM PORFIRIS

Sworn to before me this
9th day of April, 2022


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Amy E. Pudliner, Notary Public
Northampton County
My commission expires July 15, 2025
Commission number 1400155
Member, Pennsylvania Association of Notaries

Emily Porfiris

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
EMILY PORFIRIS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF HUDSON)

EMILY PORFIRIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 221 Brunswick Street, Jersey City, NJ 07302.

2. I am currently 27 years old, having been born on January 31, 1995.

3. I am the daughter of Joann M. Porfiris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother died from breast cancer on September 15, 2016, at the age of 52. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. I was only 21 years old when my mother died. She was my best friend. We did everything together. I was lucky to have such a close relationship with her. I must have called her on the phone three or four times per day from college. She was absolutely my everything. I could talk to her about anything. She was my mentor and the one person I shared the most with. She had my back, and as I got older, I had her back. She was my main support.

6. I was young on September 11, 2001. My brother was just a baby, so she was home that day. When the government finally said it was safe to return to lower Manhattan, my mom went back downtown to clean up her store. She owned a store at 107 Church Street, only a few blocks from ground zero. After 9/11, she continued to work there for 14 years, almost every single day. I remember going down to the World Trade Center site, and seeing the tents set up for all the volunteers who were helping.

7. I was a sophomore or junior in college when my mom got sick. I was home for spring break, and she complained to me about a painful hard spot in her breast. We pushed her to go to the doctor. I went with her to the doctor, along with my dad and my aunt. I was in the waiting room for a really long time. Right away, they did a biopsy. A few days later, they told us she had breast cancer. I'll never forget when my mom called me on the phone and said, "Emmy, I'm sick. I have cancer." When I came home, she hugged me in the kitchen for ten minutes and cried. From that time on, it was a battle.

8. It was horrible. My mom was such a strong woman, but you could see how scared she was. She was absolutely terrified. She wanted to be strong for my brother, who was only 14 at the time. I remember my brother asking me, "Is Mom going to die?" I wanted to convince him that she would get treatment and be fine. I accompanied my mom to her chemotherapy and radiation appointments. She would get burns on her skin from the radiation. She was so embarrassed about her hair falling out from the chemotherapy. She eventually had to have surgery.

9. After the first round of chemotherapy, surgery, and radiation, things started to get better. She wanted to go back to work part-time. She was feeling positive. Then, in the summer of 2016, we found out that the cancer had spread to her liver. They biopsied her liver and confirmed that it was cancer. Everything after that went straight downhill. Her eyes and skin were yellow, and she was vomiting all the time.

10. At the time, we had sold our family home and were all living in my aunt's house. My brother slept on a cot for a year. My mother was so weak, it was painful to watch her lie in the house all day. I had to go back to school for my senior year of college, and I just remember sitting in the car in the driveway, bawling my eyes out because I didn't know if that would be the last time I would see my mother in person. Shortly after I went back to school, my mom was

re-admitted to the hospital. I drove back and forth from college to the hospital to go see her. I had her oncologist on speed dial, and she said things weren't looking good for my mother.

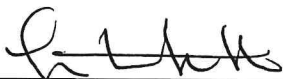
11. I came home on September 11, 2016 to check on my mother. She was watching the 9/11 Memorial service on television, lying on the couch. I was thinking about driving back to college that night, but decided to sleep on the floor next to her. That night, in the middle of the night, she started having seizures. The ambulance came in the middle of the night and that was really it. She was in the hospital having constant seizures, shaking and moaning. Then we took her home so she could at least die at home in peace. You never expect to see your mother like that. I don't think I'll ever forget that.

12. I was only 20 years old at the time that my mother got sick. My brother was 14 years old. We had to grow up really fast. My parents lost their business. My mother is gone, and we feel robbed that she is missing out on our college graduations, birthdays, and everything else. We try to be happy at every milestone, but we can't be happy because we know she could have been there. We've had a lot of financial strain. I spend a lot of my financial resources and salary helping out my dad and brother. I've contributed to living and housing expenses. I helped my brother with his college applications and his first job. It's been really hard, but I try to get better every day. My mother was an amazing, brave person, but getting sick was the one thing that scared her. I will never get past that. Her death will impact me and my family for the rest of our lives.



EMILY PORFIRIS

Sworn to before me this
9th day of April, 2022



Notary Public

OMAR LASCELLES
Notary Public, State of New Jersey
My Commission Expires Aug 3, 2026

OMAR LASCELLES
Notary Public, State of New Jersey
My Commission Expires Aug 3, 2026

Suzanne DellaRatta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
SUZANNE DELLARATTA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MIDDLESEX)

SUZANNE DELLARATTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 175 Szymanski Drive, Spotswood, New Jersey 08884.

2. I am currently 60 years old, having been born on September 5, 1961.

3. I am the sister of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from peritoneal carcinomatosis on October 22, 2014, at the age of 51. It was determined by the World Trade Center Health Program that this illness was causally connected to her exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. Mary, my sister Jeanne, and I were extremely close growing up. We lost our dad when we were very young, so we had a very close bond. All of our friends were the same, and we would hang out together every day. When we grew up, we remained just as close. I always worked full-time, and Mary would come to look after my kids when I needed a babysitter. She was great with my kids. When she was unable to work after 9/11, she would take my kids for

weeks at a time. They miss her too. I miss her every day.

6. Mary worked for Merrill Lynch as a computer technician in the World Financial Center. On September 11, 2001, she was commuting to work. She was on the bus heading into Manhattan, about to enter the Brooklyn Battery Tunnel from the Brooklyn side when the first plane hit the World Trade Center. I was in Jersey City that day. When they evacuated us, I tried to get a hold of Mary to see if she was in the World Trade Center. Mary had turned around and went back home once she learned of the attacks. Once things were deemed “safe,” Mary was ordered by her employer to go back and recover computers and parts from the World Financial Center. She was down there for months, rescuing whatever technology hadn’t been damaged.

7. Mary was proud and stubborn. She hated to be the weak one. It took a long time before she admitted that she had been in pain and uncomfortable for a very long time. Mary had lots of disorders that were linked to her 9/11 exposure—she suffered from sleep apnea, PTSD and anxiety. When she started to have severe pain in her side, she finally admitted that she was having a problem. We took her to the doctor where she was soon diagnosed with cancer in her pelvic region and sigmoid colon. She was diagnosed in September 2013.

8. Mary had a clean bill of health for nearly a year after her hysterectomy, which she underwent in October 2013. We thought that the worst had passed, and that she would get on with her life. Her life was totally destroyed. Back then, they didn’t know the damage that 9/11 exposure had done to people. She was let go from her job, and she was struggling for every penny. She couldn’t function because of her poor health.

9. Jeanne and I went with Mary every day to the hospital. Each day, I would drive from New Jersey to Staten Island to go see her. My husband worked from home and took care of our children and my father-in-law during that time. I took a lot of time away from my kids. They would come home from school, and I wouldn’t be there to help with homework or make dinner. But I wanted to do this for Mary. I didn’t want her to be in pain alone and have to see all the doctors by herself. My sister and I sat with her during her chemotherapy. I looked after Shannon, Mary’s daughter, during her surgeries. Mary couldn’t work, so anything she needed I gave to her. Even if she just wanted a pizza for dinner, I’d buy it for her. I did Mary’s grocery shopping, cleaned her home, and did her laundry. Mary had rescued many cats and dogs, she loved to rescue animals. Even when she was sick and couldn’t get out of bed, she still wanted

her foster pets to be taken care of.

10. Mary was the greatest person I've ever met. I've never loved anybody in my life more. She was a great friend and an even better sibling. She made an impact with her volunteer work. She helped find a home for so many rescue animals. Now, I think about the fact that there are so many animals out there who are suffering because she's not there to take care of them. I know it is hard for Mary's daughter Shannon. Shannon spent so long watching her mother suffer. In the beginning we were all so scared. No one knew that these illnesses were related to 9/11. It was hard for Shannon, and hard for all of us, to watch the emotional impact of 9/11 on Mary. Mary was ripped from Shannon's hands when she was just a girl. I miss Mary every single day.


SUZANNE DELLARATTA

Sworn to before me this
11 day of April, 2022


Notary Public

<p>MAUREEN J LEE Notary Public State of New Jersey My Commission Expires Sept. 27, 2023 I.D.# 2458363</p>

Jeanne Greisman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JEANNE GREISMAN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

JEANNE GREISMAN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 22 Hopkins Avenue, Staten Island, NY 10306.

2. My current age is 56, having been born on October 11, 1965.

3. I am the sister of Mary Elizabeth Reynolds, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My sister passed away from peritoneal carcinoma on October 22, 2014, at the age of 51. It was determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

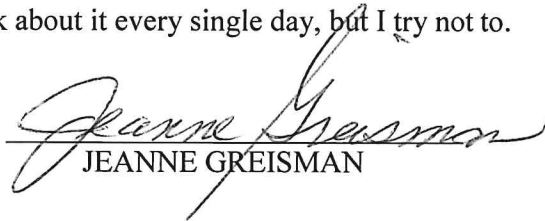
5. Mary was very involved in my life. We did a lot of things together. She was very involved with my kids, and she would take care of them. She would help get my kids ready for school in the morning and drive them to school. When she came back from school, we would sit at the kitchen table and have coffee together. We had a great relationship as sisters. We had the same friend group, and we would hang out all the time. We used to go out and have fun. She was the life of the party.

6. Mary worked in downtown Manhattan. On September 11, 2001, she was commuting to work and was about to enter the Brooklyn Battery Tunnel when the planes hit the World Trade Center. My mother came over to my house. We tried to call Mary, but we had a hard time getting in contact with her. We were concerned for Shannon, Mary's daughter. We picked her up from school and waited for Mary, but we had no contact and no way of knowing what was going on. Finally, she made it home. She returned to work at the World Financial Center soon after.

7. I learned of Mary's cancer from my mother in September 2013. As soon as I learned, I called Mary. She explained everything to me. I was heartbroken, but I immediately tried to figure out what we could do to get her better. Mary underwent a full hysterectomy, and the doctors told her they were able to remove her tumor. She went through chemotherapy, and she was good for about a year. We were so relieved at first. Then, after a year, Mary started having terrible pains. She knew her cancer had returned, and the doctors confirmed it.

8. I used to take Mary everywhere: to chemotherapy, doctors' appointments, and to the hospital. When Mary's cancer came back, I went to her house every day. It was a hard time, as I had my own children and needed to get someone to look after them. But it was important for me to be with Mary. I fed her and took care of her. I spent every day with Mary in the hospital toward the end of her life. Just trying to help her and keep her comfortable. It was so hard to have to go through that. She was in a lot of pain. It was hard watching her take her last breath.

9. Mary was my best friend. She wanted to get herself back on her feet so that she could finally go on a family vacation. Obviously, that never happened. She wanted to make a good life for her and her daughter, Shannon. I think about it every single day, but I try not to.


JEANNE GREISMAN

Sworn to before me this
8th day of April, 2022


Notary Public

